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November 29, 2022

VIA ECF

Hon. Joanna Seybert
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: United States of America v. Lorraine Pilitz
No. 17 Cr. 0053 (JS)(ARL)

Dear Judge Seybert:

I write on behalf of Ms. Pilitz to request, on consent of the government, a 45-day extension of the post-trial motion schedule, such that defense motions would be due on or about January 26, 2023.

On November 9, 2022, a jury found Ms. Pilitz guilty of structuring currency transactions (31 U.S.C. § 5324(a)(3) and (d)(2)), corruptly endeavoring to obstruct internal revenue laws (26 U.S.C. § 7212(a)), and three counts of filing a false tax return (26 U.S.C. § 7206(1)). Following the verdict, the Court granted the defense request for 30 days to file motions pursuant to Rules 29 and/or 33 of the Federal Rules of Criminal Procedure. However, due to the holidays and other circumstances, it has taken longer than expected to obtain the minutes of the trial. Our current best estimate is that we will have them sometime next week or early the following week. We anticipate that the requested extension will give us sufficient time to obtain the minutes, review them, and prepare post-trial motions.

I have conferred with AUSA Toporovsky regarding this request, and he has graciously consented.

Thank you for your time and consideration.

Sincerely,

/s

Matthew Keller
Bruce A. Barket

Hon. Joanna Seybert

November 29, 2022

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cc: AUSA Burton T. Ryan , Jr. (via ECF)
AUSA Adam R. Toporovsky (via ECF)